

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,
Plaintiff,

V.

HEWLETT PACKARD ENTERPRISE
COMPANY,
Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,
Plaintiff,

V.

INTERNATIONAL BUSINESS
MACHINES CORP.,
Defendant.

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Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION
REGARDING HPE’S MOTION TO COMPEL (DKT. 193)

Plaintiff VirtaMove, Corp. (“VirtaMove”) respectfully moves for a three day extension of time for Plaintiff to file its response to Defendant Hewlett Packard Enterprises (“HPE”) (collectively with VirtaMove, the “Parties”) Motion to Compel (Dkt. 193). With a three day extension from June 12, 2025, the deadline for VirtaMove’s response would be extended to June 16, 2025.

These extensions are not being sought for purposes of delay, but rather to ensure the Parties and their counsel have adequate time to address the issues raised in HPE's Motion and continue working towards narrowing the disputes.

Counsel for the Parties have conferred and HPE does not oppose this extension. Accordingly, Plaintiff requests that the Court grant the motion and enter the attached proposed Order.

Dated: June 12, 2025

Respectfully submitted,

By: /s/ Qi (Peter) Tong

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Qi (Peter) Tong
Qi (Peter) Tong

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on June 12, 2025.

/s/ Qi (Peter) Tong
Qi (Peter) Tong